

August 1, 2024

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

**Re: *Relevant Sports, LLC v. United States Soccer Federation, Inc.*,  
No. 19-cv-8359 (VEC)**

Dear Judge Caproni:

In accordance with the Court's July 20, 2023 Order, ECF No. 110, and the Court's May 16, 2024 Memo Endorsement, ECF No. 168, the parties submit this joint status letter regarding the above-referenced litigation and the status of the parties' settlement negotiations.

The parties' settlement conference was scheduled for July 29 but has been adjourned. The parties informed Magistrate Judge Moses that Relevant's lead trial counsel, Jeffrey Kessler, was unable to attend in person because of conflicting travel for an oral argument in the District of Hawaii and USSF's CEO, JT Batson, was unable to attend in person due to travel in connection with the Paris Olympics. Relevant requested permission for each party to bring a personal laptop and connect Mr. Kessler and Mr. Batson remotely during the settlement conference. ECF No. 172. USSF did not oppose Relevant's request, but indicated that its preference was to adjourn the settlement conference until all participants could attend in person. *Id.* On July 23, Magistrate Judge Moses adjourned the settlement conference and ordered the parties to promptly reschedule the conference for a later date when all parties and trial counsel could attend in person. ECF No. 173. On July 31, Judge Moses rescheduled the settlement conference for September 24. ECF No. 174.

In the interim, Relevant remains open to discussing a negotiated resolution with USSF. However, at this time, from Relevant's perspective, settlement discussions have not meaningfully advanced. Unless and until there is significant progress towards a settlement, Relevant intends to pursue discovery consistent with the Court's limited stay. USSF has requested information from Relevant to support Relevant's purported damages claim and facilitate settlement of this matter. To date, Relevant has not provided USSF with any of the requested information. USSF is contemplating serving formal damages-related discovery on Relevant but would prefer not to put Relevant through the expense related to responding formally to document requests and interrogatories if Relevant is willing to provide the necessary information voluntarily. The parties are discussing that voluntary production.

In accordance with the Court's Order, the parties will submit another joint status update on September 2.

Respectfully submitted,

s/ Jeffrey L. Kessler

Jeffrey L. Kessler

Jonathan J. Amoon

Angela A. Smedley

Adam I. Dale

**WINSTON & STRAWN LLP**

200 Park Avenue

New York, New York 10166

Tel: (212) 294-6700

Fax: (212) 294-4700

jkessler@winston.com

jamoona@winston.com

asmedley@winston.com

aidale@winston.com

*Counsel for Relevant Sports, LLC*

s/ Lawrence E. Buterman

Lawrence E. Buterman

**LATHAM & WATKINS LLP**

1271 Avenue of the Americas

New York, New York 10020

Tel: (212) 906-1200

Fax: (212) 751-4864

lawrence.buterman@lw.com

Christopher S. Yates (*pro hac vice*)

**LATHAM & WATKINS LLP**

505 Montgomery Street

Suite 2000

San Francisco, CA 94111

Tel: (415) 391-0600

Fax: (415) 395-8095

chris.yates@lw.com

*Counsel for Defendant United States Soccer  
Federation*